IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

LARRY D. REID, et al.,) CASE NO.: 1:21-CV 00991
Plaintiff,) JUDGE: JAMES S. GWIN
v.)
DARRYL D. MOORE,	
Defendant.	,

DEFENDANT DARRYL D. MOORE, REQUEST FOR ZOOM HEARING

NOW Comes, Defendant, Darryl D. Moore, pro se, hereby respectfully moves this honorable Court to allow the use of Zoom for the hearing.

STATEMENT OF FACTS

Defendant is representing himself Pro Se. Requiring the Defendant to take off work and travel to the Federal courthouse will cause tremendous financial hardship. The Defendant is the sole source of income for his family. Defendant financially supports two of his children that are full time college students. A Zoom hearing will lessen the financial strain on the Defendant. The loss of a day's wages will gravely impact the household of the Defendant.

Furthermore, witnesses subpoenaed by the Defendant may not be financially able to travel to Cleveland, OH. The Defendant has the right to mount a vigorous defense against the allegations. Allowing the witnesses to testify via Zoom will enable the Defendant to refute the allegations.

Respectfully submitted,

Darryl D. Moore, Pro Se

CONCLUSION

Based upon the reasons thereby outlined, the Defendants' *Request for Zoom Hearing* should be granted.

Respectfully submitted,

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Request for Zoom Hearing* was filed this ___27__ day of April 2024 and served electronically accordingly upon counsel for Plaintiff,

K. Ann Zimmerman Vasvari & Zimmerman Ste. 470 20600 Chagrin Blvd Shaker Heights, OH 44122 216-458-5880 x3

Email: Zimmerman@vasvarilaw.ocm

Raymond V. Vasvari, Jr. Ste. 800 Tower East 20600 Chagrin Blvd Shaker Heights, OH 44122-5353 216-458-5880

Fax: 216-302-3700

Email: vasvari@yasvarilaw.com

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

LARRY D. REID, et al.,) CASE NO.: 1:21-CV 00991
Plaintiff,	JUDGE: JAMES S. GWIN
v.)
DARRYL D. MOORE,))
Defendant.)

DEFENDANT DARRYL D. MOORE, REQUEST FOR PERMISSION TO E-FILE

NOW Comes, Defendant, Darryl D. Moore, pro se, hereby respectfully moves this honorable Court to grant him permission to electronically file documents. Defendant's ability to electronically will ease his financial burden and expedite his response.

Respectfully submitted,

Darryl D. Moore, Pro Se

CONCLUSION

The Defendants' Request to Electronically File should be granted.

Respectfully submitted.

Case: 1:21-cv-00991-JG Doc #: 48-1 Filed: 04/30/24 5 of 12. PageID #: 425

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing *Request to Electronically File* was filed this ___27__ day of April 2024 and served electronically accordingly upon counsel for Plaintiff,

K. Ann Zimmerman Vasvari & Zimmerman Ste. 470 20600 Chagrin Blvd Shaker Heights, OH 44122 216-458-5880 x3

Email: Zimmerman@vasvarilaw.ocm

Raymond V. Vasvari, Jr. Ste. 800 Tower East 20600 Chagrin Blvd Shaker Heights, OH 44122-5353 216-458-5880

Fax: 216-302-3700

Email: vasvari@vasvarilaw.com

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

LARRY D. REID, et al.,) CASE NO.: 1:21-CV 00991
Plaintiff,) JUDGE: JAMES S. GWIN
v.)
DARRYL D. MOORE,	
Defendant.	,

DEFENDANT DARRYL D. MOORE, REQUEST FOR CONTINUANCE TO SUBPOENA WITNESSES AND OBTAIN RECORDS

NOW Comes, Defendant, Darryl D. Moore, pro se, hereby respectfully moves this honorable Court to grant a continuance. As more fully set forth hereinafter, in that Defendant request additional time to subpoena witnesses and compel the submission of Form 990, and medical records.

STATEMENT OF FACTS

Defendant will subpoena witnesses to testify on his behalf. Additional time is needed to make a Request for Production for medical records and documents pertaining to the operation of the MBN Network (My Breakthrough Now) that are pertinent to a vigorous defense against the allegations.

The Plaintiff, Larry Darnell Reid who leases a residence at 35 Mt. Paran Road, Atlanta, GA 30327, is using this court to continue to retaliate against the Defendant because he did an indepth investigation into the "business" practices of the Plaintiff, "ministry work", and interviewed three individuals that accused him of sexual assault and child molestation. One of

the accusers claims the Plaintiff infected him with H.I.V. If the information had become a matter of public record during trial, it would have destroyed his "business" and "ministry." The Plaintiff could not survive having an open police investigation in North Carolina being discussed by the Defendant and one of his accusers. That is why the Plaintiff requested mediation.

Plaintiff has failed to stop his employee Davyon Charles Demil Augustus who uses the social media name Consciouz TV or his proxy Brian Hugh Henry, II who uses the social media name Knocc Out Media from harassing, stalking, or making video content about the Defendant. This is a direct violation of the mediation agreement. Through previous court filings, the Defendant has proven that Augustus works for the Plaintiff. The Plaintiff does not employ Brian Henry, but he does the biding of Larry Reid so that he will not be seen publicly attacking me. Their harassment reached such a boiling point that two CSPO (CV-22-964092) were granted to the Defendant. A police report was filed against them for calling the place of employment of the Defendant. Brian Henry even went as far as to call the elderly mother of the Defendant twice and record her live on social media without her permission.

A police report (24-1772) has been filed with the Euclid Police Department against Augustus for violating the CSPO. Defendant is awaiting a decision from the Euclid Prosecutor.

Respectfully submitted,

CONCLUSION

Based upon the study of the law and facts set forth above and for the reasons thereby outlined, the Defendants' *Request for Continuance* should be granted.

Respectfully submitted,

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Request for Continuance filed this

___27__ day of April 2024 and served electronically accordingly upon counsel for Plaintiff,

K. Ann Zimmerman Vasvari & Zimmerman Ste. 470 20600 Chagrin Blvd Shaker Heights, OH 44122 216-458-5880 x3

Email: Zimmerman@vasvarilaw.ocm

Raymond V. Vasvari, Jr. Ste. 800 Tower East 20600 Chagrin Blvd Shaker Heights, OH 44122-5353 216-458-5880

Fax: 216-302-3700

Email: vasvari@vasvarilaw.com

Case: 1:21-cv-00991-JG Doc #: 48-1 Filed: 04/30/24 10 of 12. PageID #: 430

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

LARRY D. REID, et al.,) CASE NO.: 1:21-CV 00991
Plaintiff,) JUDGE: JAMES S. GWIN
v.)
DARRYL D. MOORE,)
Defendant.)

DEFENDANT DARRYL D. MOORE, REQUEST FOR CONTINUANCE TO SUBPOENA WITNESSES AND OBTAIN RECORDS (ADDENDUM)

STATEMENT OF FACTS

Defendant received the official document from the court April 25, 2024. Prior to receipt of this document, the Defendant was already scheduled to appear in another legal hearing on the same day via Zoom. This is another reason a continuation has been requested.

Respectfully submitted,

CONCLUSION

Based upon the study of the law and facts set forth above and for the reasons thereby outlined, the Defendants' *Request for Continuance* should be granted.

Respectfully submitted,

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing Request for Continuance filed this

___27__ day of April 2024 and served electronically accordingly upon counsel for Plaintiff,

K. Ann Zimmerman Vasvari & Zimmerman Ste. 470 20600 Chagrin Blvd Shaker Heights, OH 44122 216-458-5880 x3

Email: Zimmerman@vasvarilaw.ocm

Raymond V. Vasvari, Jr. Ste. 800 Tower East 20600 Chagrin Blvd Shaker Heights, OH 44122-5353 216-458-5880

Fax: 216-302-3700

Email: vasvari@vasvarilaw.com